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January 28, 1994

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JAN 31 1994

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Ex Parte Presentation GEN Docket No. 90-314  
RM-7140, RM-7175, RM-7618

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, you are hereby notified that Russ Coffin, Director, PCS Business Development, Ron Cross, Director Regulatory Policy, Ihor Nakonecnyj, Senior Product Line Manager, and the undersigned, all of Northern Telecom, met with Commission staff members on January 26, 1994 and discussed issues in the referenced proceeding.

The discussions are summarized in the attachments to this notification, two copies of which are being provided. The attachments were also provided to the FCC staff.

The following Commission staff were present at the meetings on January 26: Beverly Baker, Roz Allen of the Private Radio Bureau; Tom Stanley, Julius Knapp, Phil Inglis, David Means, and Larry Petak of the Office of Engineering and Technology.

If you have any questions please call me at (202) 347-4610.

Sincerely,

Raymond L. Strassburger  
Director, Government Relations - Telecommunications Policy

RLS/gj  
Attachments

cc: Beverly Baker  
Roz Allen  
Tom Stanley  
Julius Knapp  
Phil Inglis  
David Means  
Larry Petak

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Northern Telecom - Licensed PCS Highlights

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1. Base Station maximum power should be at least 1600 Watts EIRP (1000 Watts ERP):
  - High gain antennas require higher power output to **balance link budgets** thereby efficiently utilizing radiated power for 0.250 Watt mobiles;
  - Higher power required for **economical coverage of rural and less dense population areas** as well as economical service start-up creating a more competitive PCS service offering;
  - Higher power base stations will significantly reduce the total number of antennas thereby reducing cost of site acquisition and environmental impact;
  - Higher power results in **no increase** (sometimes decrease) **in interference** to existing microwave systems;
  - Base stations in controlled environment which **controls risks to health**;
  - Increased **flexibility in base station site location** leads to greater economic benefit and rapid deployment for operators with resultant enhanced public service.
2. The U.S. PCS industry is aggressively putting PCS standards in place requiring no further intervention by the FCC **at this time**:
  - NT unequivocally supports full standards formulation and is actively and aggressively contributing to standards formulation in industry forums;
  - Vendors and operators are working towards **basic standards agreement in 1994**;
  - Mandatory standards could delay rather than expedite standards formulation;
  - Requirement of standards before deployment will **'stifle the introduction of important new technology'**.
3. Interim type approval requirements of handheld units should be satisfied by either SAR or extension of the low-power exclusion formula:
  - NT places the health and safety of the public as the highest priority;
  - IEEE has written to the FCC indicating that the low-power rule can be conservatively extrapolated into the 2 GHz band without creating adverse health risk;
  - Docket 93-62 will exhaustively treat and define requirements for handheld sets;
  - Lack of SAR testing facilities will bottleneck PCS deployment.

January 26, 1994

**Northern Telecom - Unlicensed PCS Highlights**

The WINForum Etiquette was a hard won industry consensus which was extensively discussed over many meetings to ensure consistency and technical integrity. Northern Telecom is deeply concerned about the elements of the WINForum Etiquette that were left out of the FCC Part 15 rules:

Northern Telecom is concerned about the omission of the WINForum recommended provision for multi-carrier devices. This provision was intended to permit an access mechanism for more than one carrier in devices intended to communicate with both voice and data devices such as PDA's.

In certain high density applications, the traffic will exceed the capacity of a single carrier and this access mechanism is essential to permit the innovation and competition that is the key element in the Commission's vision for the unlicensed PCS band. The multi-carrier device access mechanism in the WINForum Etiquette was designed to insure no decrease in protection from interference.

Northern Telecom urges the Commission to restore the provisions of the WINForum Etiquette regarding multi-carrier devices, as well as the other deviations as detailed in the WINForum and Northern Telecom pleadings.